

KELLY JARRETT,
Plaintiff,
v.

STIPULATION AND ~~[PROPOSED]~~ ORDER TO EXTEND BRIEFING SCHEDULE

KILOLO KIJAKAZI,
Acting Commissioner of Social Security,
Defendant.

1 The parties stipulate through counsel that Defendant, the Acting Commissioner of Social Security
2 (the “Commissioner”), shall have an extension of thirty (30) days to respond to Plaintiff’s Motion for
3 Summary Judgment in this case. In support of this request, the Commissioner respectfully states as
4 follows:

5 1. The Commissioner’s response to Plaintiff’s Motion for Summary Judgment was due
6 October 20, 2022. This is Defendant’s first request for an extension of this deadline.

7 2. Following the lifting of the stay, briefing of disability matters increased significantly. As
8 of last month, Counsel for the Commissioner had twenty matters with briefing deadlines in the following
9 forty-five days. Counsel currently has seventeen matters with briefing deadlines in the next forty-five
10 days. Accordingly, Counsel has received assistance from other attorneys within the agency for briefing
11 matters in the District Court. Due to a miscommunication regarding the transfer of cases, the briefing of
12 this matter was inadvertently and mistakenly overlooked. Counsel apologizes to Plaintiff and the Court
13 for the delay associated with this extension.

14 3. Counsel for the Commissioner has consulted with Plaintiff’s counsel who advised that he
15 has no objections.

16 4. This request is made in good faith and is not intended to delay the proceedings.

17 WHEREFORE, Defendant requests until November 20, 2022, to respond to Plaintiff’s Motion
18 for Summary Judgment.

19
20 Date: October 24, 2022

JESSE S. KAPLAN, ATTORNEY AT LAW

21 By: /s/ Caspar Chan for Jesse S. Kaplan*

22 JESSE S. KAPLAN

23 *Authorized by email on October 24, 2022

Attorneys for Plaintiff

24 Date: October 24, 2022

PHILIP A. TALBERT

25 United States Attorney

26 Eastern District of California

27 By: /s/ Caspar Chan

CASPAR CHAN

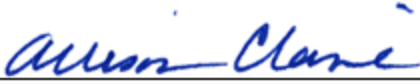
28 Special Assistant United States Attorney

Attorneys for Defendant

ORDER

APPROVED AND SO ORDERED

DATED: October 24, 2022



ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE